



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 20, 2021

By ECF

The Honorable Margo K. Brodie  
Chief United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Andre Wilburn  
Criminal Docket No. 19-108

Dear Chief Judge Brodie:

The government respectfully writes to request that the Court grant the government an additional week to October 29, 2021, to respond to the defendant's bail motion as SAUSA Virginia Nguyen, the prosecutor assigned to this matter, is currently on trial before the Honorable Pamela K. Chen.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/ Robert Polemeni  
Robert Polemeni  
Assistant U.S. Attorney  
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